

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA**

TIFFANY LEWIS, *on behalf of herself and*) Case No.: 1:25-cv-00275-JPH-MJD
others similarly situated,)
))
Plaintiff,)
))
v.)
))
REGISTER.COM, INC.,)
))
Defendant.)
_____)

**JOINT MOTION TO ADVANCE TIME OF STATUS CONFERENCE, AND FOR
RELATED RELIEF TO EXTEND THE TIME TO RESPOND TO THE DEFENDANT'S
MOTION TO STRIKE**

Plaintiff and Defendant, through their respective counsel, respectfully move this Court to advance the time of the upcoming telephonic status conference currently set for October 22, 2025 at 11:00 a.m. (Eastern), *see* ECF No. 54, to 10:00 a.m. (Eastern) on the same date. In support of this request, the parties state as follows:

1. Both counsel for Plaintiff has a conflict at the currently scheduled time of 11:00 a.m. (Eastern) on October 22, 2025. Advancing the conference to 10:00 a.m. (Eastern) would resolve that conflict and allow counsel for all parties to attend the telephonic status conference.

2. In addition, the parties wish to advise the Court regarding the status of Defendant's compliance with the Court's September 16, 2025 order on Plaintiff's Motion to Compel. *See* ECF No. 42. In response to the Court's order, Defendant produced two spreadsheets on October 3, 2025. Following review of the spreadsheets, they appear to be responsive to only two of Plaintiff's subject requests for production, and that additional production was required in response to Requests for Production Numbers 7, 8, and 10. On October 15, 2025, the parties met and conferred concerning the Defendant's supplemental discovery production, during which Plaintiff's concerns

were communicated to counsel for Defendant. Following the parties' meet and confer, Defendant informed Plaintiff that it had identified certain unintentional inconsistencies within the data previously produced and was in the process of reviewing its data to correct the issues and produce supplemental records. To this end, Defendant is currently re-extracting and reviewing the data with the assistance of its experts and anticipates supplemental production.

3. Because of these data issues, the parties jointly agreed to reschedule the previously scheduled mediation from October 21, 2025 to October 30, 2025, to allow time for the corrected data to be produced and reviewed.

4. The parties remain committed to cooperating in good faith to resolve the data issues and to proceed with mediation on October 30, 2025.

5. Relatedly, Plaintiff's response to Defendant's motion to strike class allegations ("MTS") is due on October 30, 2025. *See* ECF No. 53.

6. In an effort to conserve the resources of the parties, and potentially this Court, the parties ask this Court to extend Plaintiff's deadline to file a response to Defendant's MTS until November 13, 2025—or two weeks after the re-scheduled mediation in this matter.

WHEREFORE, the parties respectfully request that the Court advance the October 22, 2025 telephonic status conference from 11:00 a.m. to 10:00 a.m. (Eastern), and for such other and further relief as the Court deems just and proper. The parties additionally ask this Court to extend Plaintiff's deadline to file a response to Defendant's MTS until November 13, 2025—or two weeks after the re-scheduled mediation in this matter.

Dated: October 20, 2025

/s/ Anthony I. Paronich
Anthony I. Paronich
PARONICH LAW, P.C.
350 Lincoln Street, Suite 2400
Hingham, MA 02043
Tel: (617) 485-0018
Fax: (508) 318-8100
anthony@paronichlaw.com

Aaron D. Radbil
Greenwald Davidson Radbil PLLC
5550 Glades Road, Suite 500
Boca Raton, Florida 33431
(561) 826-5477
aradbil@gdrlawfirm.com

Counsel for Plaintiff and the proposed class

A. Jeff Ifrah
Abbey Block
Ifrah PLLC
1717 Pennsylvania Ave. NW
Suite 650
Washington, D.C. 20006
Tel: (202) 524-4140
jeff@ifrahlaw.com
ablock@ifrahlaw.com

Counsel for Defendant